

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

UNITED STATES OF AMERICA

PLAINTIFF

V.

CIVIL ACTION NO: 3:24-cv-00712-HTW-ASH

MISSISSIPPI STATE SENATE

DEFENDANT

**MOTION TO STAY THE ENTIRETY OF THE
PROCEEDINGS – INCLUDING THE DEADLINE FOR
RESPONSIVE PLEADING**

Because of the Trump Department of Justice’s recent internal memorandum issuing a litigation freeze, the Mississippi State Senate (“Senate”) moves this Court for an Order staying these proceedings until President Trump’s Attorney General and/or Assistant Attorney General for Civil Rights can review this case. The Senate files an accompanying Memorandum Brief in Support of its Motion to Stay the Entirety of the Proceedings – Including the Deadline for Responsive Pleading, and the following exhibits:

- Exhibit A, January 22, 2025, Memorandum for Kathleen Wolfe, Supervisory Official of the Civil Rights Division, SUBJECT: LITIGATION FREEZE.
- Exhibit B, Bethany Johnson’s January 24, 2025, Email.
- Exhibit C, Louis Whitsett’s January 24, 2025, Email.
- Exhibit D, Armin Moeller’s January 24, 2025, Letter.
- Exhibit E, Louis Whitsett’s January 27, 2025, Email.

This motion is not being presented for the purpose of delay but rather to conserve the resources of this Court and the Parties.

Respectfully submitted January 27, 2025.

MISSISSIPPI STATE SENATE

BY: s/ Armin J. Moeller, Jr.
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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and service will be perfected upon the following CM/ECF participant(s) electronically on January 27, 2025.

s/ Armin J. Moeller, Jr.

Of Counsel

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